

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. 1:96CR153
	)	
Plaintiff,	)	JUDGE PETER C. ECONOMUS
	)	
v.	)	
	)	
MAHMOUD F. SALT, I,	)	
aka MIKE SALT, I, JR.,	)	
Defendant,	)	
	)	
MOHAMMED F. SALT, I,	)	
aka MIKE SALT, I, SR.,	)	
nka MOHAMMED AL AMMOURI,	)	
Defendant-Petitioner,	)	
	)	
and	)	
	)	
USRAH MARY SALT, I,	)	AGREEMENT AND CONSENT
Petitioner.	)	<u>ORDER OF FINAL FORFEITURE</u>

It appears to the Court that proper proceedings for the issuance of a final order of forfeiture [of approximately \$546,096.37] have been had in this case as follows:

1. By an Amended Order of Forfeiture, filed on November 13, 2006 [Dkt. No. 43], the following property was forfeited to the United States under 18 U.S.C. § 982(a)(1) for disposition in accordance with law, subject to the notice provisions of 21 U.S.C. § 853(n)(1): Arab Bank (Switzerland), Ltd., Zurich - Account Number 10.191146-0 in the name of Mohammed Al Ammouri (1947), and its contents. [Co-defendant/petitioner Mohammed F. Salti is now known as Mohammed Al Ammouri. As of May 26, 2010, the subject Swiss bank account was valued at \$841,096.37.]

2. Under 21 U.S.C. § 853(n), third parties asserting a legal interest in initially forfeited properties are entitled to a judicial determination of the validity of the legal claims or interests they assert.

3. Pursuant to 21 U.S.C. § 853(n), the United States published notification of the Court's Amended Order of Forfeiture. Said notice advised all third parties of their right to petition the Court within thirty (30) days of the final publication date for a hearing to adjudicate the validity of their alleged legal interest in the subject Swiss bank account.

4. No third party claims to the subject Swiss bank account were made as a result of the published notification.

5. Additionally, the United States mailed a Notice of Forfeiture and a copy of this Court's Amended Order of Forfeiture to: Mohammed F. Salti (aka Mike Salti, Sr., nka Mohammed Al Ammouri), c/o Robert J. Rotatori, Rotatori Bender Co., L.P.A.; 800 Leader Building, 526 Superior Avenue East, Cleveland, Ohio 44114.

6. On January 17, 2007, Mohammed Al Ammouri and Usrah Mary Salti, husband and wife, filed a petition asserting interests in the subject Swiss bank account. [Dkt. No. 48.]

AGREEMENT AND ORDER

7. The United States and petitioners Mohammed Al Ammouri and Usrah Mary Salti have reached the following settlement:

a.) Mohammed Al Ammouri hereby withdraws his petition/claim to the subject Swiss bank account.

b.) The United States agrees to the return of \$295,000.00 of the funds contained in the subject Swiss bank account to Usrah Mary Salti.

c.) Mohammed Al Ammouri and Usrah Mary Salti agree to the forfeiture of the remaining funds contained in the subject Swiss bank account; namely, approximately \$546,096.37.

8. Mohammed Al Ammouri shall execute a consent directive (a copy of which is attached hereto as Exhibit 1) authorizing and requesting that the Arab Bank (Switzerland), Ltd., Zurich, release and transfer the entire contents of the subject bank account to the United States, c/o the U.S. Department of the Treasury (the investigating/disbursing authority). The original/executed consent directive shall be turned over to the United States.

9. The United States will contact the authorized Swiss authorities, and will request that the freeze placed on the subject bank account be lifted, so that the funds contained in the account may be returned to the United States in accordance with the consent directive.

10. Concerning the \$295,000.00 to be returned to Usrah Mary Salti, a check in this amount shall be issued by the Department of the Treasury. The check is to be made payable to: "Usrah Mary

Salti and Rotatori Bender Co., L.P.A.". The check shall be forwarded to: Richard L. Stoper, Jr., Esq. (Attorney for Usrah Mary Salti and Mohammed Al Ammouri), Rotatori Bender Co., L.P.A., 800 Leader Building, 526 Superior Avenue East, Cleveland, Ohio 44114-1498.

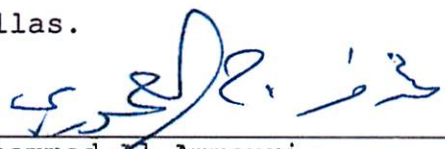
11. The remaining funds contained in the subject Swiss bank account (approximately \$546,096.37) are hereby finally forfeited to the United States in accordance with 18 U.S.C. § 982(a)(1), and no right, title or interest shall exist in Mohammed Al Ammouri (fka Mohammed F. Salti), Usrah Mary Salti, or any other party. The United States shall assume possession and take control of the approximately \$546,096.37 and shall dispose of it in accordance with law.


12. The terms of this agreement do not affect the tax obligations, fines, penalties, or any other monetary obligation Usrah Mary Salti may owe to the United States. Federal law requires the Department of the Treasury (and other disbursing agencies) to offset federal payments to collect any delinquent tax and non-tax debts owed to the United States, and to individual states (including past-due child support).

13. Mohammed Al Ammouri (fka Mohammed F. Salti) and Usrah Mary Salti hereby waive any and all claims, arising out of the forfeiture proceedings against the subject Swiss bank account, that they have or may have against the United States of America;

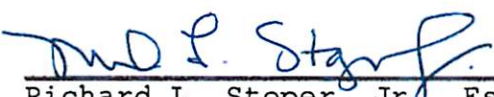
departments, agencies, agents and employees of the United States of America; and, all state and local law enforcement departments, agents and officers involved in this action, including claims for alleged violations of constitutional rights. The parties to this matter are to bear their own costs and attorney's fees.

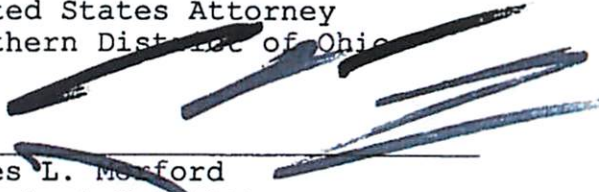
14. After review, this Court adopts in full Dkt. No. 148, the Report and Recommendation of Magistrate Judge James S. Gallas.

  
\_\_\_\_\_  
Mohammed Al Ammouri  
fka Mohammed F. Salti

  
\_\_\_\_\_  
Usrah Mary Salti

Steven M. Dettelbach  
United States Attorney  
Northern District of Ohio

  
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By:   
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SO ORDERED this 13th day of August, 2010.

s/Peter C. Economus  
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Peter C. Economus  
United States District Judge